

Reply Comments of the American Library Association
CC Docket No. 98-146

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The American Library Association appreciates the opportunity to reply to comments filed in response to the Federal Communications Commission's (FCC's or Commission's) above-captioned inquiry into the status of the deployment of advanced telecommunications capabilities as required by Section 706 of the Telecommunications Act of 1996.

SUMMARY

In response to comments regarding the role of schools and libraries in deployment of advanced telecommunications capabilities we offer the following points:

1. Providing advanced telecommunications capabilities to schools and libraries promotes universal service.
2. Relying on the Universal Service Program for Schools and Libraries to deploy advanced telecommunications capabilities is not sufficient.
3. Supporting the Universal Service Program for Schools and Libraries should be considered the floor, not the ceiling for deploying advanced telecommunications capabilities.

Providing advanced telecommunications capabilities to schools and libraries promotes universal service.

As argued by many commenters, this notice of inquiry should evaluate the full spectrum of advanced telecommunications capabilities that currently include enhanced basic services, wireless, satellite, cable and other technologies. (See AT&T, page 4; Bell Atlantic, Page 4 and BellSouth, Pages 7-31) Those technologies that are available in the marketplace are important avenues for imparting publicly available information, governmental and non-governmental, to all citizens particularly where resources can be shared within a community, as is the case with libraries and schools.

The Center for Media Education argues that residents of inner cities require access to advanced telecommunications capabilities to compete with suburbanites in the digital world of the twenty-first century. Citizens without access will be increasingly disenfranchised from governmental programs, their communities and important non-governmental information sources.¹ While lower income residents may not be able to afford access to advanced telecommunications capabilities individually, the local library can provide that access as well as the local schools. In some cases, that may be the only access available to these citizens, as in Pennsylvania where over one-third, 34.5%, of library users had no access to the Internet other than at the library.² Supporting that access as a provider of last resort can reduce the level of "digital divide" that many fear is coming. Currently, those services and facilities are being developed and deployed at a

¹ Center for Media Education Comments at 8,9

² John C. Bertot & Charles R. McClure, *Impacts of Public Access to the Internet through Pennsylvania Public Libraries*, INFORMATION TECHNOLOGY AND LIBRARIES, Dec. 1997 at 158-159.

rapid pace supported by the Commission's Universal Service Program for Schools and Libraries.

AT&T asserts that schools and libraries "needs for advanced telecommunications capability is [sic] likely to be similar to those of businesses surrounding them."³ In fact, while the technical needs may be similar, the service needs are very different. It is difficult to see where the general physical plant requirements, whether it is wire, wireless, satellite or cable, would be significantly different between a school district, library or business. However, the populations served by libraries and schools – our future generations and the general public irrespective of race, income, sex, creed or status – give these institutions unique responsibilities.

Relying on the Universal Service Program for Schools and Libraries to deploy advanced telecommunications capabilities is not sufficient.

AT&T believes that the Universal Service Program for Schools and Libraries "is more than sufficient to ensure the deployment of advanced services to schools and libraries."⁴ However, this program cannot resolve certain market issues that inhibit access to advanced telecommunications capabilities.

The Universal Service Program for Schools and Libraries is a significant and powerful effort to support universal service. It allows schools and libraries better access to some advanced telecommunications services because, in most cases, it brings them into the realm of affordability. In the first year alone more than 30,000 applications were received representing an estimated demand of \$2.02 billion in discounted services.

³ AT&T Comments at 53

⁴ AT&T Comments at 54

However, while this program can address the problem of affordability for most schools and libraries, it does not address the issue of availability. The Universal Service Program for Schools and Libraries does not promote new technologies and, in fact, discriminates against certain types of telecommunications services. For a school or library to utilize a service, it must be "commercially available" (42 CFR 54.502). This poses a significant limitation in outlying areas.

For example, what is commercially available in Denver, Colorado is not necessarily commercially available in Silverton, Colorado. These school districts and libraries may have a similar need to meet curriculum requirements, a similar ability to utilize resources for training and administration to implement state-wide standardized requirements and to purchase the appropriate hardware, software and training to accomplish these tasks but have very significant differences in their ability to meet them simply because of the advanced telecommunications capabilities that are available to them.

Some school districts have been told by service providers that certain advanced services are available for some of their schools, but not others. Libraries have been told by providers that there is simply not a "business case" to support bringing an advanced telecommunications service to a community when only one customer has requested it.

As pointed out in the National Telephone Cooperative Association's (NTCA's) comments, in more rural communities, "schools are demanding broadband service the most."⁵ This suggests that schools are ahead of the other businesses surrounding them in their need and demand for service and that, in some cases, they may be the only customer

in need of these services. Libraries also serve as a technology center for communities where there is little additional demand for advanced services. This has posed problems for communities where only one customer is requesting a service and suggests that more needs to be done to promote advanced telecommunications capabilities, particularly in rural areas.

Supporting the Universal Service Program for Schools and Libraries should be considered the floor, not the ceiling, for deploying advanced telecommunications capabilities.

The Universal Service Program for School and Libraries currently has a \$2.25 billion cap in each funding year. However, due to start-up issues, the program is providing only \$1.9 billion for the first 18 months of the program despite the estimated demand of \$2.02 billion in the first year. This pent-up demand suggests that there is an overwhelming need to make advanced telecommunications capabilities affordable.

AT&T states that the Universal Service Program for Schools and Libraries has an “overly generous funding level.”⁶ As the applications for the current funding year show, in fact, demand for the program already exceeds supply.

In addition, affordability is only part of the equation. Availability is not addressed by this program, and demand, at least from this market segment, is not enough to deploy services in a sufficient manner.

⁵ NTCA Comments at 2

⁶ AT&T Comments at 54

Conclusion

We greatly appreciate the Commission's interest in exploring the most effective means to deploy advanced telecommunications capabilities. We believe that libraries and schools provide opportunities to deliver these services to communities where companies have deemed it inefficient to provide services to residents individually for technical or market demand reasons.

We look forward to working with the Commission on these issues as it works to promote access to advanced telecommunications capabilities for all Americans.

Respectfully Submitted,

A handwritten signature in black ink that reads "Carol C. Henderson". The signature is written in a cursive style with a horizontal line underneath the name.

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